

From: Matt Antonelli matt@ahlawfirm.com
Subject: Re: Snyders v. St. Jude
Date: November 8, 2017 at 1:43 PM

MA

To: Alex S Rinn ARinn@carlsoncaspers.com, Sarah Ring (sring@ringipfirm.com) sring@ringipfirm.com, Zac zac@ahlawfirm.com, larrythompson larry@ahlawfirm.com, Allison Newberry anewberry@ahlawfirm.com, Stafford Davis (sdavis@stafforddavisfirm.com) sdavis@stafforddavisfirm.com
Cc: Joe W Winkels JWinkels@carlsoncaspers.com, aiancu@irell.com, mchu@irell.com, Heinrich, Alan (AHeinrich@irell.com) AHeinrich@irell.com, Johannesson, Leah (ljohannesson@irell.com) ljohannesson@irell.com

Alex—This interrogatory response is deficient in that the response says that the portico valve is covered by 1 or more of a list of patents, but does not actually identify the patents that are covered by the valve. The interrogatory asks SJM to identify only those patents that SJM contends covers its product for purposes of this litigation, so SJM's objection that this interrogatory is unduly burdensome is not well taken. Moreover, we are entitled to know why SJM contends any such patent covers its products. Please let us know when you are available to meet and confer about SJM's deficient response to this interrogatory. Best regards, —Matt

Matthew Antonelli
Antonelli, Harrington & Thompson LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3005 (direct)
(646) 228-5996 (cell)
(713) 581-3020 (fax)
www.ahlawfirm.com
matt@ahlawfirm.com

From: Alex S Rinn <ARinn@carlsoncaspers.com>
Date: Monday, November 6, 2017 at 6:52 PM
To: Matt Antonelli <matt@ahlawfirm.com>, Sarah Ring <sring@ringipfirm.com>, Zac <zac@ahlawfirm.com>, Larry Thompson <larry@ahlawfirm.com>, Allison Newberry <anewberry@ahlawfirm.com>, "Stafford Davis (sdavis@stafforddavisfirm.com)" <sdavis@stafforddavisfirm.com>
Cc: Joe W Winkels <JWinkels@carlsoncaspers.com>, "aiancu@irell.com" <aiancu@irell.com>, "mchu@irell.com" <mchu@irell.com>, "Heinrich, Alan (AHeinrich@irell.com)" <AHeinrich@irell.com>, "Johannesson, Leah (ljohannesson@irell.com)" <ljohannesson@irell.com>
Subject: Snyders v. St. Jude

Counsel,

Attached and served upon you is St. Jude's Response to Snyders' Interrogatory No. 15.

Best,
Alex

CARLSON
CASPERS

Alexander S. Rinn • Attorney
Carlson Caspers Vandenburg Lindquist & Schuman P.A.
225 South Sixth Street Suite 4200 Minneapolis MN 55402

CASPERS

INTELLECTUAL PROPERTY
LITIGATION AND COUNSELING

225 South Sixth Street, Suite 1200, Minneapolis, MN 55402
direct 612.436.9638 main 612.436.9600
arinn@carlsoncaspers.com

carlsoncaspers.com

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